

Ms. Marlene H. Dortch, Secretary Office of the Secretary 445 12<sup>th</sup> Street, SW Suite TW-A325 Washington, DC 20554

RE: Correct Solutions, LLC

CY2012 Annual CPNI Certification Filing

EB Docket No. 06-36

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2012 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Correct Solutions, LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3004 or via email to <a href="mailto:rnorton@tminc.com">rnorton@tminc.com</a>.

Sincerely,

## /s/Robin Norton

Robin Norton

Consultant to Correct Solutions, LLC

cc: Ryan Horvath - Correct Solutions, LLC (via email)

cc: LeeAnn Gadberry - Correct Solutions, LLC (via email)

file: Correct Solutions, LLC - FCC

tms: FCCx1301

Enclosures RN/lm

## ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2013:

Covering calendar year 2012

Name of company(s) covered by this certification:

Correct Solutions, LLC

Form 499 Filer ID:

829509

Name of signatory:

Patrick H. Temple

Title of signatory:

Managing Member

- 1. I, Patrick H. Temple, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 et seq.
- 2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 et seq. of the Commission's rules.
- 3. The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.
- 4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
- 5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Patrick H. Temple, Managing Member

Correct Solutions, LLC

Date

<u>Attachment A</u> Statement of CPNI Procedures and Compliance

## Customer Proprietary Network Information Statement of Procedures and Compliance For 2012 Correct Solutions, LLC

Correct Solutions, LLC operates solely as an institutional services provider and as such provides only operator assisted call completion services for transient end users incarcerated in correctional or confinement facilities. Therefore, our service does not involve a presubscribed relationship with the end users.

Our marketing efforts are directed only towards correctional facilities, and such efforts do not include the use of CPNI. Should we expand our business in the future to include the provision of services that involve CPNI, we will follow the applicable rules set forth in 47 CFR Subpart U, including, as necessary, the institution of operational procedures to ensure protection of customer information.

We do not provide call detail information over the telephone. All customer service personnel are trained not to discuss call detail information unless the date and time of the call on the phone bill matches our billing records. Customer service personnel are trained on our company privacy and CPNI policies prior to being allowed to take calls. Training includes being made aware of potential disciplinary action for violation of company policy. A specific employee is designated as responsible for maintaining and updating our employee manual that specifies these procedures and policies.

For called parties who establish a prepaid account, we attempt to obtain customer name, address, inmate name, applicable correctional facility and phone number to be called. Such information is not validated for accuracy in any way. Employee access to this data is strictly limited. Correctional facility management routinely requests or requires this information for investigation purposes.

Regarding customer inquiries concerning prepaid accounts, if a customer cannot provide the required call detail information to customer service representatives over the phone, we will provide requested information only by mail, and only if the customers sends a self-addressed stamped envelope to our address. The address on the envelope is verified against the address given during the prepaid account set up process. If they do not match, call detail is not provided. We will only provide a brief statement indicating that we are not authorized to release this information because account holder information could not be verified. We do not disclose call detail on line to end users under any circumstances

Any requests for raw call records are referred to designated management personnel at the applicable correctional facilities who, by contract, own the call records, and whose responsibility it is to release the information to the appropriate legal authorities according to their own procedures. Should we ever be required provide call records ourselves, we would do so only subject to subpoena, and records will be kept in accordance with the applicable rules.

As an institutional services provider, we do not have any retail locations and therefore do not disclose CPNI in-store.

We have processes in place to discover and protect against any attempts by third parties to gain unauthorized access to call detail records.

We have procedures in place to notify law enforcement in the event of a breach of the call detail records. We have not had any such breaches during 2012, but we have a process in place to maintain records of any breaches discovered and notifications made to the US Secret Service and the FBI.

We have not taken any actions against data brokers in the last year.

We did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2012.

By the nature of the institutional calling services business, the call detail we have is not linked to any presubscribed service or customers. Accordingly, we have not developed any information with respect to the processes pretexters may use to attempt to access CPNI.